



Federal Communications Commission
Washington, D.C. 20554

August 18, 2015

VIA ECFS ELECTRONIC DELIVERY

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Measuring Broadband America Program (Mobile Collaborative), GN Docket No. 12-264

Dear Ms. Dortch:

On August 18, 2015, representatives of broadband providers, public interest groups, companies, and other organizations met in person and via conference call with Commission staff to discuss schedules and milestones of the Measuring Broadband America Program (MBA) mobile efforts.¹

Mr. Walter Johnston, Chief Electromagnetic Compatibility Division (EMCD), and James Miller, Senior Attorney Advisor welcomed collaborative members. Mr. Johnston announced the agenda for the meeting to discuss the status of the ongoing privacy and statistics analysis of mobile data; competition and mobile report analysis; 2015-2016 Code of Conduct signature drafts; North Carolina State University Institute for Advanced Analytics (NCSU IAA) team announcement; and working group plans on carrier naming, technical privacy analysis technical, statistics and data processing.

Mr. Miller discussed that staff have worked through a number of data processing platform issues but were actively analyzing data from November 2013 through June 2015. Mr. Miller discussed the process defined in the mobile program's privacy policy for preparing mobile broadband performance data for use in reports and public release.² As described in the privacy policy, staff were developing a technical solution to identify patterns in the raw data that might be exploited to compromise any subscriber's privacy. He discussed that the precise time and location associated with each observation would likely be replaced with biannual or quarterly time value and the cellular market area or other geography of the particular test. He discussed that in past

¹ A list of attendees and presentation materials are attached to this filing in GN Docket No. 12-264.

² FCC Speed Test App Privacy Policy and Terms of Use,
<https://www.fcc.gov/measuring-broadband-america/mobile/mobile-terms-privacy-notice>.

meetings participants had suggested close attention should be paid to the make and model of handsets as the the kind of handset could be a potential “quasi-identifier”. Mr. Miller discussed the staff’s view that handset type might be separated from any row level data and included in a separate form. Participants suggested the staff reach out to handset manufacturers to invite them to attend future meetings and understand the nature of the program and the data collected, and Mr. Miller indicated that the data collected included thousands of distinct types but the program invites all interested stakeholders to attend and participate in the program.

Mr. Miller discussed that many of the technical approaches used in the field of computer science and statistics to identify potential privacy concerns are similar to those used for evaluating statistical quality. He discussed that as the number and diversity of samples in a given area or interval of time increased the ability to make statistically relevant inferences increased and also improved the robustness of the data against potential reidentification. Mr. Miller introduced Paroma Sanyal, Chief Economist, Wireless Telecommunications Bureau, who discussed that statistical analysis of the mobile data for the 18th Annual Mobile Competition Report was proceeding well. She discussed that analysis was focusing on identifying appropriate sample sizes and other data quality measures.

Mr. Miller circulated a draft of the 2015-2016 Code of Conduct and encouraged participants to provide copies of completed agreements. He also announced that a team of researchers from the North Carolina State University Institute for Advanced Analytics (NCSU IAA) program would be working with staff on a variety of statistical and other projects over the coming eight months. He discussed that a similar NCSU IAA worked with staff and completed a peer review and made other contributions to the fixed measurement effort in 2013. He shared similar plans for the current team to review and support statistical, technical privacy and other data related aspects of the mobile measurement effort.

Mr. Miller invited participants to begin identifying potential stakeholders interested in focused meetings discussing the technical and legal aspects of on carrier naming, technical privacy analysis technical, statistics and data processing. He described the past history of focused meetings on legal privacy matters, and other topics and suggested that these break out groups would focus on the respective software and data processing aspects of the mobile effort. He invited participants to look for upcoming announcements on the email distribution list for future meeting plans.

Mr. Miller thanked all the participants for their active participation in these meetings and encouraged participants to look for an invitation to an upcoming meeting via the collaborative distribution list in the coming weeks. Mr. Johnston thanked participants for their attendance and closed the meeting.

Sincerely,

/s/ James Miller

James Miller, Senior Attorney Advisor
Electromagnetic Compatibility Division/OET
Federal Communications Commission